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Planning Research Corporation

WA-2917

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ENFORCEMENT CONFIDENTIAL

TECHNICAL REVIEW OF RCRA RECORDS

Chemical Processors, Inc.
Pier 91 Plant
Seattle, Washington

RECEIVED
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DRAFT REPORT

WASTE MANAGEMENT BRANCH

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, D.C. 20460

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USEPA RCRA



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Sylvia E Briggs 7/12/94
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1.0 INTRODUCTION

PRC Environmental Management, Inc., received a work assignment from the U.S. Environmental Protection Agency (U.S. EPA) Region 10 to provide technical support in the review of a document submitted by Chemical Processors, Inc. (Chempro). The document reviewed by PRC is the training program for Chempro's Pier 91 facility. A description of this document is provided in Section 2.0.

40 CFR 265 was used as guidance material during the review process. PRC developed a checklist of requirements to evaluate the compliance of the document with 40 CFR 265. The completed checklist is attached to this report.

2.0 DOCUMENT DESCRIPTION

Chempro divided its training program into two categories for ease of implementation. They are "general" training and "job-specific" training. General training will be provided to all employees once a month through a 1-hour safety meeting. Job-specific training will be provided largely through on-the-job training specific to that job description.

Twelve sessions comprise the general training program each lasting 1 hour:

- o General Safety
- o Chemical Hazards
- o Protection Equipment - General
- o Respirators
- o Fresh Air Supply
- o Emergency Response - Fire
- o Emergency Response - Spills
- o Foamite System, First Aid
- o DOT/EPA Labeling/Placarding/Manifesting
- o General Recordkeeping - Drum Tracking
- o General Inspection and Maintenance
- o Forklift Safety and Operation

3.0 DEFICIENCIES

The deficiencies in Chempro's training program that were identified by PRC are listed in order according to the 40 CFR 265.16 requirements, which is the same order on the attached checklist.

- o As required by 40 CFR 265.16 (a)(1), the owner or operator must maintain a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position. Chempro provided two blank tables to fulfill this requirement. It also did not provide any written description of the type and amount of training that will be provided to the positions of production manager, foreman, dockman, and maintenance man.
- o As required in 40 CFR 265.16 (a)(1), facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this part. Chempro did not provide details on the kind of training that employees will receive during on-the-job training.
- o As required by 40 CFR 265.16 (a)(2), the training program must be directed by a person trained in hazardous waste management procedures and must include instructions to facility personnel on hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. Chempro's training program only provided information on the instructor for chemical hazards and DOT/EPA labeling/placarding/manifesting sessions. No instructor was designated for the other 10 training sessions identified in the previous section. Also, the instructor's qualifications are not provided in the training program. Chempro also did not provide the waste management procedure relevant to each position (for example, Chempro did not identify the emergency coordinator and its role in the training program).
- o As required by 40 CFR 265.16 (a)(3), the training program must be designed, at a minimum, to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, equipment, and systems. Chempro's training program only outlined emergency response for fires and spills. Chempro did not in detail address the contingency plan training (for example, key parameters

for automatic waste feed cut-off system, communication or alarm systems).

- o As required in 40 CFR 265.16 (b), facility personnel must successfully complete the training program within 6 months after the date of their employment or assignment to a facility, or to a new position at a facility, whichever is later. Chempro stated that new employees will receive general introductory training on chemical processors during their first 2 weeks of employment. However, Chempro did not specify if this general introductory training is the same as general training or if it will only cover certain sessions of the general training. Chempro also did not discuss how long it will take to complete the general training and on-the-job training for new employees.
- o As required in 40 CFR 265.16 (d)(1), the owner or operator must maintain the following documents and records at the facility: the job title for each position at the facility related to hazardous waste management and the name of the employee filling each job. Chempro's training program did not provide the name of the employees filling each job.
- o As required in 40 CFR 265.16 (d)(2), the owner or operator must maintain a written job description for each position. This description must include the requisite skill, education, or other qualifications and the duties of facility personnel assigned to each position. Chempro provided the necessary information for the positions of plant manager, operator, and frontman, but did not provide the necessary information for the positions of foreman, production manager, dockman, and maintenance man.
- o As required in 40 CFR 265.16 (d)(4), the owner or operator must maintain records that document the training that has been given to and completed by facility personnel. Chempro provided the blank sign-in sheet in the training program. However, PRC is not able to determine if this form is complete without seeing the actual sign-in sheet.

4.0 CONCLUSION

The training program prepared by Chempro is not completed yet. Chempro did not provide detailed descriptions for most training sessions; did not provide a name to fill each position; and did not provide the qualifications for the instructor. In addition, the job descriptions for various positions are not presented in the same format.

**ATTACHMENT
CHECKLIST**

	Provided	Deficient
Personnel Training [40 CFR 265.16]		
Training Program Requirements:		
Contain elements of document required in 265.16(d)(3) [265.16(a)(1)] Remarks: for certain position, Chempro did not provide what kind of training the employee will receive.	<u>Yes</u>	<u>Yes</u>
Directed by qualified person [265.16(a)(2)] Remarks: Chempro did not provide the qualifications for the instructor.	<u>No</u>	<u> </u>
Instruction related to job position [265.16 (a)(2)] Remarks: Chempro did not address the job position in relationship with the emergency procedure and the training program.	<u>Yes</u>	<u>Yes</u>
Ensure proper emergency response by acquainting personnel with alarm systems and key facility operations [265.16(a)(3)] Remarks: Chempro did not provide the detailed description of training for the emergency procedure.	<u>No</u>	<u> </u>
Personnel Requirements:		
Successfully complete hazardous waste instruction [265.16(a)(1)] Remarks: Chempro did not provide what kind of training that the employee will receive from on-the-job training.	<u>Yes</u>	<u>Yes</u>
Finish the course within 6 months of new employment, date of assignment or position acquisition [265.16 (b)] Remarks: Chempro did not specify that the new employee will complete their training within six months.	<u>Yes</u>	<u>Yes</u>
Participate in an annual review [265.16(c)] Remarks:	<u>Yes</u>	<u> </u>

	Provided	Deficient
Owner/operator requirements:		
Maintain on site documentation relating to hazardous waste management that includes:		
o job title & employee filling positions [265.16(d)(1)]	<u>No</u>	<u> </u>
o job description and required skill [265.16(d)(2)]	<u>Yes</u>	<u>Yes</u>
o training each position will require initially and yearly [265.16(d)(3)]	<u>Yes</u>	<u> </u>
o documentation verifying personnel training [265.16(d)(4)]	<u>No</u>	<u> </u>
Remarks: Chempro did not provide the employee names to fill each positions, the requested education or skill, and the documents to verify the training.		
Retain records of personnel training until closure or for three years after employment [265.16(e)]	<u>Yes</u>	<u> </u>

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SPCC Plan
Chempro, Pier 91
Attachment 1

Monthly Inspection Report

I. Containment: OK Needs Repair

1. Berms appear structurally sound. ✓

2. Oil or water accumulations within berm. ✓

3. Vegetation or rubbish accumulations. ✓

4. Operation of sump and separator satisfactory. ✓

Comment on repair needed _____

II. Tanks: OK Needs Repair

1. Leakage at seams, or access covers. NO

2. Evidence of overflow. NO

3. Rust or corrosion at base, on exterior. OK

4. Foundations settling or cracking. NO

Comment on repair needed _____

III. Valves, Pipes and Pumps: OK Needs Repair

1. Leakage at fittings and glands. NO

2. Proper operation of valves and pumps. ✓

3. Rust and corrosion. ✓

4. Pipe supports for damage or abrasion. ✓

Monthly Inspection Report (cont'd):

Comments on repairs needed _____

IV. Loading/Unloading Area

1. Evidence of leakage or spills.
2. Rust and corrosion.
3. Damaged or missing equipment.
4. Drip buckets available.

OK

Needs Repair

NO

NO

NO

YES

Comments on repairs needed _____

V. Security

1. Proper operation of facility security lighting.
2. Rubbish or vegetation that would reduce overall visibility within the facility.

OK

Needs Repair

✓

✓

VI. Facility and Personnel General

1. SPCC Plan is on file.
2. SPCC Plan reviewed with personnel within past three (3) months.
3. Plant personnel are properly trained in the operation and maintenance of equipment.
4. Plant personnel are properly trained in the use of spill prevention equipment.
5. Plant personnel clearly understand spill reporting procedures.
6. Fire extinguishers fully charged and inspected within past 12 months.
7. Oil cleanup materials available.

YES

✓

✓

✓

✓

✓

✓

✓

Monthly Inspection Report (cont'd):

VI. Facility and Personnel General (cont't)

- 8. No obvious fire hazards. *NO*
- 9. All oily residue cleaned from valves, pipes, tanks, steps, ladders and ground surfaces. *YES*
- 10. Storage of parts, equipment and materials neat and orderly. *OK*

Comments on repair needed COULD RE. STACK PARTS PILE

DATE: *6-2-86*

SIGNED: *Ed Moody*

NOTE: This report is to be maintained in file for a minimum of three (3) years.